

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

C.R.M.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-404
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(C) and the Stipulated Protective Order (Dkt. No. 27), and exclusively because Plaintiff has advised Defendant that she intends to object to the Court's January 5, 2021 order denying the sealing of materials Plaintiff has designed as confidential under the protective order (Dkt. No. 66), Defendant respectfully moves the Court for leave to file under seal certain portions of Defendant's reply memorandum in support of its motion to renewed dismiss, with a redacted version of the memorandum filed on the public docket.

Pursuant to the Court's January 7, 2021, New Security Procedures to Protect Highly Sensitive Confidential Documents, the proposed sealed filing will be filed in paper with the Clerk's Office.

Pursuant to the Stipulated Protective Order, the memorandum supporting sealing and proposed order must be filed by Plaintiff. Unless Plaintiff supports sealing of these materials, Defendant does not oppose filing the documents on the public record.

Dated: January 8, 2021

Respectfully submitted,

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By: /s/
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